

REMARKS

Claims 1, 11, 15, 17 and 18 have been amended, and new dependent claims 23-26 have been added. Claims 1-26 are presently pending.

The Examiner is thanked for the courtesies extended during the Examiner Interview conducted on January 19, 2006. Claims 1, 11, 15, 17 and 18 have been amended consistent with the proposed claim amendments discussed during the Examiner interview and summarized in the Interview Summary. The Examiner's indication in the Interview Summary that the pending claims, including the proposed amendments, would distinguish over the cited prior art (subject to a more detailed review of the cited references by the Examiner) is acknowledged.

In addition, the specification has been amended to correct typographical and grammatical errors uncovered in preparation of this response.

In view of such amendments and the following remarks, reconsideration and allowance of the claims, as presently presented, are respectfully requested.

EXAMINER'S ACTION

The 35 U.S.C. § 103 Rejections

Claims 1-7 and 15 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,594,863 ("Stiles") in view of U.S. Patent No. 6,049,874 ("McClain *et al.*") and U.S. Patent No. 5,740,370 ("Battersby *et al.*"). In addition, claims 8-9 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Stiles in view of McClain *et al.* and Battersby *et al.*, and further in view of U.S. Patent No. 6,453,404 ("Bereznyi *et al.*"). Further, claims 10 and 16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Stiles in view of McClain *et al.*, Battersby *et al.* and U.S. Patent No. 5,706,435 ("Barbara *et al.*").

Claims 1 and 15 have been amended to recite, in relevant part, that the "first storage cache is for associating with a plurality of first authorized computer workstations" and that "data file modifications entered by any of the first workstations [are incorporated] into the cached data file" at the first storage cache "as the modifications are entered, such that the cached data file is a current version." As discussed during the Examiner Interview and set forth in the Interview Summary, the Examiner agreed that Stiles does not teach method and system for providing shared access to data files using a storage cache that is "for associating with a plurality of first authorized computer workstations." The client cache in Stiles exists for each client, in other words, each client in Stiles has its own client cache which serves as the client's memory, such that the Stiles client cache is not the same as the claimed storage cache. Nowhere does Stiles teach or suggest that a client cache is for associating with a plurality of workstations, so as to provide for a storage cache interface between the plurality of workstations and the file server via the cache server, as required by claims 1 and 15. (See, for example, specification paragraphs [0018], [0019], [0035] and [0038]).

McClain *et al.* and Battersby *et al.*, in combination, do not cure the deficiencies of Stiles, as neither of these additional references teach or suggest a storage cache as required by claims 1 and 15.

Accordingly, claims 1 and 15 are patentable over the cited combination of references, and claims 2-10 and 16, which depend directly or indirectly from claims 1 and 15, are patentable over the cited combinations for the same reasons as set forth above with respect to claim 1 and because of the further restrictions they add.

In addition, it is respectfully submitted that the rejection of claims 11-14 under 35 U.S.C. § 103(a) as being unpatentable over Barbara *et al.* in view of McClain *et al.*, U.S.

Patent No. 5,924,096 ("*Draper et al.*") and Battersby *et al.*, also should be withdrawn. As discussed during the Examiner interview, claim 11, which is directed to a method for managing shared access to data files stored in a file server requiring, in relevant part, the step of automatically transmitting file update data from a cache server to a first storage cache in response to a workstation request for access to the data file received at the first storage cache, has been amended to recite that the first storage cache is for associating with a plurality of workstations. As stated by the Examiner during the Examiner interview, none of the references relied upon in the rejection of claim 11 teach or suggest the storage cache, as required in amended claim 11.

Accordingly, claim 11 is patentable over the cited combination of references, and furthermore claims 12-14, which depend directly from claim 11, are also patentable over the cited combination for the same reasons as set forth above with respect to claim 11 and because of the further restrictions they add.

Further, it respectfully requested that the rejection of claims 17-20 under 35 U.S.C. § 103(a) as being unpatentable over Stiles in view of U.S. Patent No. 5,689,706 ("*Rao et al.*") and Battersby *et al.*, and the rejection of claims 21-22 under 35 U.S.C. § 103(a) as being unpatentable over Stiles in view of Rao *et al.*, Battersby *et al.* and further in view of McClain *et al.*, should be withdrawn. Each of claims 17 and 18 have been amended to recite that the claimed system for managing shared access to data files includes, in relevant part, a plurality of storage caches for accessing the data files stored in the file server by establishing a communications connection with the cache server, where "each of the storage caches is for associating with a plurality of workstations". As discussed above, during the Examiner interview the Examiner acknowledged that the storage cache, as claimed in amended claims 17 and 18,

distinguishes over Stiles. Furthermore, Rao *et al.* and Battersby *et al.*, in combination, do not cure the deficiencies of Stiles concerning the claimed storage cache.

Accordingly, claims 17 and 18 are patentable over the cited combination of references. Further, claims 19-22, which depend directly or indirectly from claim 18, are patentable over the cited combination for the same reasons as set forth above with respect to claim 18 and because of the further restrictions they add.

Further, new dependent claims 23-26, which depend from claim 17 or 18 respectively, also are patentable for the same reasons as set forth above with respect to claims 17 and 18 and because of the further restrictions they add. Claims 23 and 24, which are supported at paragraphs [0061] and [0062-0064] of the specification and FIG. 5, recite that the leasing module grants at least one reader right to the data file in substantially real time following the request for the lease for the data file. Claims 25 and 26, which are supported at paragraphs [0061] and [0068-0069] of the specification and FIG. 5, recite that the system includes a second storage cache having a cached data file, which provides that reader rights can be granted at the first storage cache for a cached data file corresponding to the cached data file at the second storage and that data file modifications can be entered in the cached data file at the second storage cache while the reader rights to the cached data file at the first storage continue.

For the foregoing reasons, withdrawal of the Section 103 rejections is, therefore, respectfully requested.

CONCLUSION


For the foregoing reasons, it is believed that all of the claims, as presently presented, are patentable.

The Examiner is invited to telephone the undersigned if it is believed that further

amendment and/or discussion would help to advance the prosecution of the present application.

Reconsideration and allowance of claims 1-26 are, therefore, respectfully requested.

Respectfully submitted,


Davy E. Zoharich
Registration Number 37,267

NORRIS, McLAUGHLIN & MARCUS
P.O. Box 1018
Somerville, New Jersey 08876-1018
Phone: (908) 722-0700; Fax: (908) 722-0755
E-Mail: ipdept@nmmlaw.com
Attorney Docket No: 102916-001US